

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,

v.

CHARLES SANTICH and

OLD DUTCH MUSTARD CO., INC., d/b/a
PILGRIM FOODS, INC.

Defendants.

No. 1:25-cr-00002-LM-TSM-01/02

ASSENTED-TO MOTION TO CONTINUE SENTENCING

Now come Old Dutch Mustard Co., Inc., d/b/a Pilgrim Foods, Inc. (“Old Dutch”) and Charles Santich, defendants in the captioned matter, by and through their attorneys, Nixon Peabody LLP, and respectfully submit this assented-to motion requesting that the Court continue the sentencing of Old Dutch and Mr. Santich presently scheduled for June 23, 2025, at 11:00 a.m., for thirty days to July 23, 2025, or any date thereafter amenable to the Court. In support of this motion, defendants state as follows:

1. On February 24, 2025, Mr. Santich pleaded guilty to Count One of the Information.
2. On February 24, 2025, Old Dutch pleaded guilty to Counts Two through Four of the Information.
3. The Court scheduled the sentencing hearing for June 23, 2025, at 11:00 a.m.
4. In order to facilitate the continued cooperation and good faith efforts of the parties to further narrow and hopefully reach agreements on legal and factual issues relevant to sentencing, including ongoing efforts to reach an agreement on forfeiture, and conserve judicial, taxpayer, and

the defendants' resources, the defendants are requesting an assented-to continuance of the sentencing hearing for thirty days to July 23, 2025, or any date thereafter amenable to the Court.

5. Assistant United States Attorney Matthew T. Hunter and Environment and Natural Resources Division Trial Attorney Ronald A. Sarachan assent to the continuance requested in this motion.

6. Given the Government's assent and the Court's discretion, defendants submit that a separate memorandum of law is not required.

WHEREFORE, defendants respectfully request that this Honorable Court:

- A. Grant this Motion and continue the sentencing, presently scheduled for June 23, 2025, at 11:00 a.m., for thirty days to July 23, 2025, or any date thereafter amenable to the Court; and
- B. Grant such other and further relief as justice requires.

Respectfully submitted,

OLD DUTCH MUSTARD CO., INC.,
d/b/a PILGRIM FOODS, INC.

By their attorneys,

Dated: May 5, 2025

/s/ S. Amy Spencer

S. Amy Spencer (NH Bar No. 266617)
NIXON PEABODY LLP
900 Elm Street, 14th Floor
Manchester, NH 03101
Tel: (603) 628-4000
aspencer@nixonpeabody.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically on this 5th day of May 2025, to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ S. Amy Spencer